

0018

*OK Incoming
C/025/0005*

From: Joe Helfrich
To: OGMCOAL
Date: 5/1/2008 11:12 AM
Subject: Fwd: Alton/Coal Hollow C/025/0005 Task # 2910
Place: OGMCOAL
Attachments: Alton comments.doc

Please file in incoming C/025/0005.....thanks.....Joe

>>> Lori Hunsaker 5/1/2008 8:47 AM >>>
Joe,

I got your message -- I was in an interagency wildfire meeting all afternoon yesterday and I have a GOPB meeting this morning.

My (all of PLPCOs) groupwise is still acting very sluggish -- but I am going to try and send the comments anyway -- if it times out for 15 mins that will be fine cuz I'll be in a meeting if it hasn't gone though by this afternoon I'll try something else.

Call you when I get out of my meeting.

Lori

Alton/Coal Hollow
CRMP 03/10/08
Comments
By Lori Hunsaker

Generally speaking I think this CRMP has incorporated much of what was discussed during the outline circulation. Overall I think it is a really good document, but I believe there are still some relevant issues that should be considered and addressed in the Introduction and phased data recovery. My comments below are directed to specific sections and given work priority time constraints may not be as clear as h

INTRODUCTION:

The introduction states that there are 99 sites – of these sites, which are on the Private fee lands and which are on the BLM lease lands? Are all of these sites historic properties (eligible)? Perhaps simply reference the reader to Table 2 located later in the document. It may be obvious from the Table of Contents, but I found myself wondering when I was reading through this section.

It may be useful to discuss or clarify why there is a separation between the private fee area and the BLM lease area, and why and how the processes (private state permit vs. Federal lease) and laws (i.e Section 106 vs. Utah Code 9-8-404) differ. And why this CRMP is being produced to cover resources on both of these areas. That is, clearly define the differences and explain why this document is considering them as a whole. Further it should include a discussion of other indirect effect areas – like the transportation corridors and why these are being included and what the indirect are likely to be and why they are being considered in this document. I realize these areas are still being defined, but perhaps a “place holder” could be inserted – where is SWCA with defining the different alternatives?

It would also be useful if the different areas (private vs. BLM) were distinguished on the Figure 1 Map. Perhaps the sites could be different colors to denote eligible vs. not eligible. It would also help if a discussion were added noting that that the APE and/or CRMP area noted on this map is likely to change and why this is so, given the BLM lease process. Just curious, who is our target audience for this document? If we expect it to be circulated to a broader public audience, could we simply remove the map showing specific locations? So far that seems to be the case, which I think is good.

Perhaps a discussion of how this document relates to and will change according to the BLM lease EIS would be useful as well. This could also help to further qualify why this CRMP is a living document.

Overall, I would imagine this discussion to span at least 4 pages or so. I believe this detail is useful to help the reader understand the history and purpose of this document – i.e why there are different permit/lease phases, how these state/BLM differences translate into the three stage approach and why this document is considering them as a whole despite the separate state and federal requirements and undertakings.

The introduction discusses the management of sites. Is this only eligible historic properties? Particularly with regard to Phase I – are all sites going to be tested or only the eligible ones?

I like the three-phase approach, and I understand that the goal is for previous phases to inform us about the next, but the way this is currently phrased, it seems to indicate to me that Phase I is simply an exercise in meeting state mitigation requirements. It isn't clear to me how Phase I is integrated with Phase II & III. For example, shouldn't the question outlined in Phase II (what is the nature, extent and site integrity of these sites be appropriate here? And if these sites have data that is capable of addressing larger research questions wouldn't they pass into the next phase? I saw the private sites in question and I realize that this is unlikely, but it seems to me that there isn't a true articulation between the phases. How would we expect the Phase I data to inform our research trajectory any more than Phase II?

EFFECTED ENVIRONMENT

I think this section is great! I appreciate that it has been tailored to the archaeologically relevant data. Does any of the data from any of the sites in the CRMP area appear to indicate specific adaptations to the climate described? Was there any evidence (yet) of exploitation of any of the resources listed? Probably not, but if so (e.g. evidence of pinion exploitation or hunting a specific type of game or use of a specific water source), that could be cool to note so that the natural effected environment section ties in with the overall discussion (in addition of course to giving a good environmental background).

Cultural-Historical Overview

I really like how well it is tailored to the specific area. Are there any diagnostic artifacts from any of the sites that were located in the CRMP area that clearly identify them as fitting into portions of this cultural-historical overview? I realize that this is discussed somewhat later in the document, but a simple sentence at the end of a "stage" like... 42Kaxxxx appears to be representative of this phase. This might tie in the various sections nicely and help an uneducated reader understand the meaning of this overview.

Previous Work...

Great, I think this gives the reader a really good understanding of where investigations have gone in the past (especially the regional investigations section) and to some extent sets up thoughts regarding current investigations.

Overview of Cultural Resources in the Project Area

I really like this section and despite the minor tie in suggestions I made earlier, this section does reference much of the information given earlier in the document – it isn't critical for earlier "tie in" but I think it helps the reader remain interested in why you are telling them this information, even if it is repeated in a slightly different manner later in the document – this isn't critical, just a taste or style suggestion. The only substantial suggestion I would make regarding this section is that MOAC may consider moving the

last paragraph (concerning the EIS and the transportation corridor) to the introduction for reasons noted above.

CONSEQUENCES ...

Phase I

Perhaps it's just me, but I had to read this paragraph three times to understand what was and was not proposed for mitigation. Perhaps it could be more clear if the description went from large to small – i.e all private on western portion of Alton amp, 15 sites located in 2005 inventory, 14 determined to be historic properties, 7 avoided by current undertaking, 7 determined to be adversely effected so data recovery to mitigate adverse effects. These seven consist of ... (just a suggestion – as someone who hasn't read this several times and isn't intimately familiar w/ the sites).

The only other suggestion would be to (either in the CRMP or in the Data Recovery Plan) clearly describe how sites x, y, & z (presumably all prehistoric) are expected to relate to the other sites in the BLM area – that is how do the Archaic sites in the private area compare to the Archaic sites in the BLM area and the Proto Historic private to BLM.

I think the geomorphological element is key here especially for informing Phase II and III, but again, I think the real first or otherwise question here is what data do these sites really offer. Also, there aren't any Fremont/Anasazi sites in this phase – how will that inform later questions? Finally, what if the historic site (or the others for that matter) yield data that goes beyond the scope of your original questions? Will those sites proceed to the next phase?

I think a clear introductory discussion of why there is separation between State and BLM undertakings but why they are being considered as a whole will help drive and clarify this.

Production and Review...

I'm not sure MOAC can or should stipulate review period timeframes. There are rules, etc. set forth by agencies for agencies and generally these are adhered to; however, agency priorities, protocols, and processes may sometimes conflict with submission dates and review timeframes.

Data Recovery Plan